

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ROBERT SPRINGER, et al., individually and on behalf of all others similarly situated,

Plaintiffs,

v.

CODE REBEL CORPORATION, et al.,

Defendants.

Case No. 16-cv-3492 (AJN)

**NOTICE OF LEAD PLAINTIFFS' MOTION FOR FINAL APPROVAL
OF CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of the Lead Plaintiffs' Motion for Final Approval of Class Action Settlement and Plan of Allocation, dated November 3, 2017, the accompanying Joint Declaration of Jeremy A. Lieberman and Phillip Kim, dated November 3, 2017, the exhibits annexed thereto, all prior papers and proceedings herein, and such additional evidence or argument as may be presented at or before the hearing, lead plaintiffs William Tran and Adrian Ybarra (collectively, "Lead Plaintiffs"), through their undersigned attorneys, will move this Court, before the Honorable Alison J. Nathan, United States District Judge for the Southern District of New York, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, on December 8, 2017 at 10:00 a.m. for an Order (1) certifying a class, for settlement purposes only, of all persons, entities, or legal beneficiaries or participants in any entities who purchased or otherwise acquired Code Rebel Corporation securities from the date of its initial public stock offering on or about May 19, 2015, to May 12, 2017, inclusive, and who were damaged thereby, (2) approving the terms and conditions of the Settlement Agreement and Release, dated May 15, 2017, as fair, reasonable, and

adequate for the settlement of all claims asserted by the Settlement Class against Defendants, (3) approving the proposed Plan of Allocation as a fair and reasonable method to allocate the Net Settlement Fund among Settlement Class Members, and (4) entering Final Judgment dismissing this Action with prejudice.

A proposed order will be submitted with Lead Plaintiffs' reply papers no later than December 1, 2017, after the deadline for objections has passed.

Dated: November 3, 2017

Respectfully submitted,

POMERANTZ LLP

/s/ Jeremy A. Lieberman
Jeremy A. Lieberman
Justin S. Nematzadeh
Joseph A. Hood, II
600 Third Avenue, 20th Floor
New York, New York 10016
Telephone: (212) 661-1100

POMERANTZ LLP

Patrick V. Dahlstrom
Ten South LaSalle Street, Suite 3505
Chicago, Illinois 60603
Telephone: (312) 377-1181

THE ROSEN LAW FIRM P.A.

Laurence Rosen
Phillip Kim
Kevin Chan
275 Madison Avenue, 34th floor
New York, New York 10016
Telephone: (212) 686-1060

*Co-Lead Counsel for Lead Plaintiffs and
the Class*

GOLDBERG LAW PC

Michael Goldberg
Brian Schall
1999 Avenue of the Stars, Suite 1100
Los Angeles, California 90067
Tel: (800) 977-7401

Additional Counsel for Lead Plaintiffs